

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

LOIS WASHINGTON,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,

Defendant.

Case No.: 1:22-cv-02631

Judge: Honorable Nancy L. Maldonado

DEFENDANT PORTFOLIO RECOVERY ASSOCIATES' MOTION FOR JUDGMENT

Defendant, Portfolio Recovery Associates (“Portfolio” or “PRA”), by and through its attorneys, David M. Schultz and Ruddy S-A. Abam of Hinshaw & Culbertson LLP, pursuant to Federal Rules of Civil Procedure 41 and 56, hereby moves that judgment be entered in its favor and against Plaintiff as to all claims asserted in the Complaint. In support of its Motion, Defendant incorporates by reference the arguments made and the authorities cited in its Memorandum of Law, filed contemporaneously with this Motion.

WHEREFORE, Defendant, Portfolio Recovery Associates requests that this Court enter an Order granting judgment in Defendant’s favor and against Plaintiff on all claims asserted in the Complaint and that judgment be entered thereon pursuant to the Federal Rules of Civil Procedure.

Dated: December 20, 2022

Respectfully Submitted,

PORTFOLIO RECOVERY ASSOCIATES,

/s/ Ruddy S-A. Abam

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CERTIFICATE OF SERVICE

I, Ruddy Abam, an attorney, hereby certify that on December 20, 2022 I electronically filed the foregoing **DEFENDANT'S MOTION FOR JUDGMENT** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day and was served upon all parties of record via the Court's CM/ECF system and/or by using Mail and U.S. Mail.

Pro Se

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